

or leading to such documents, and any due diligence in connection with such documents and transactions.

12. Documents and communications regarding the price and valuation described in Paragraph 61 of the Complaint, including but not limited to all documents and communications concerning how such figures were derived.

13. Documents and communications regarding SPA 3 and the other transactions and documents described in Paragraphs 63-70 of the Complaint, including any internal or external communications or negotiations preceding or leading to such documents or transactions, and any due diligence in connection with such documents and transactions.

14. Documents and communications regarding the price and valuation described in Paragraph 63 of the Complaint, including but not limited to all documents and communications concerning how such figures were derived.

15. Documents and communications regarding the consideration and Earn-Out Payments You received as part of SPA 3 as described in Paragraphs 67-68 of the Complaint.

16. Documents and communications regarding any due diligence that the FTX Group performed in connection with SPA 1, SPA 2, and SPA 3.

17. Communications with BDO USA, LLP (“**BDO**”) regarding DAAG.

18. Documents and communications regarding BDO’s April 7, 2022 report titled *ASC 805 Valuation of Certain Assets of FTX Trading Ltd.* (“**BDO Report**”).

19. Documents and Communications with BDO preceding or leading to the BDO Report, including but not limited to any documents or other information provided to BDO in connection with or in preparation of the BDO Report.

20. Any other valuation of DAAG or FTX Europe's assets and liabilities besides the BDO Report.

21. Documents and communications regarding K-DNA, including those regarding:

- a. Communications with or about K-DNA,
- b. Services offered by K-DNA;
- c. Any valuation of K-DNA;
- d. Any diligence prior to any acquisition of K-DNA;
- e. Regulatory and operating licenses held by K-DNA, including applications thereof;
- f. The K-DNA SPA;
- g. Whether K-DNA would or not be "included by name in SPA 3" as described in Paragraph 87 of the Complaint, including but not limited to the communications referred to in Paragraph 87;
- h. Any due diligence or research regarding K-DNA prior to any potential or actual acquisition of K-DNA;
- i. The documents and transactions described in Paragraphs 89-96 and 102 of the Complaint; and
- j. The change of K-DNA's trade name to FTX Europe.

22. Documents and communications regarding Cosima Capital, including but not limited to documents and communications regarding: Cosima Capital providing services to Plaintiffs and/or Debtors, payments from Plaintiffs and/or Debtors to Cosmia Capital, and the allegation in Paragraph 50 of the Complaint that "[You] pitched Bankman-Fried to hire his advisory firm, Cosima Capital."

23. Documents and communications regarding Crypto Lawyers, including but not limited to documents and communications regarding: Crypto Lawyers providing services to Plaintiffs and/or Debtors, payments from Plaintiffs and/or Debtors to Crypto Lawyers, and the allegation in Paragraph 50 of the Complaint that "[You] pitched Bankman-Fried to hire . . . Gruhn's law firm, Crypto Lawyers."

24. Documents and communications regarding LI, including those regarding:

- a. Purchase and sale of interests in DAAG;
- b. Any non-cash consideration received from Debtors; and
- c. Any cash payments received from Debtors.

Dated: October 25, 2023
Wilmington, Delaware

/s/ Peter J. Keane

Laura Davis Jones (DE Bar No. 2436)
Peter J. Keane (DE Bar No. 5503)
PACHULSKI STANG ZIEHL & JONES LLP
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, Delaware 19801
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: ljones@pszjlaw.com
pkeane@pszjlaw.com

THE DALEY LAW FIRM LLC
Darrell Daley (admitted *pro hac vice*)
Samantha Neal (admitted *pro hac vice*)
4845 Pearl East Circle, Suite 101
Boulder, Colorado 80301
Telephone: (303) 479-3500
Email: Darrell@daleylawyers.com
Samantha@daleylawyers.com

- and -

MORRISON COHEN LLP
Joseph T. Moldovan (admitted *pro hac vice*)
Heath D. Rosenblat (admitted *pro hac vice*)
Jason P. Gottlieb (admitted *pro hac vice*)
Michael Mix (admitted *pro hac vice*)
909 Third Avenue, 27th Floor
New York, New York 10022
Telephone: (212) 735-8600
Facsimile: (212) 735-8708
Email: jmoldovan@morrisoncohen.com
hrosenblat@morrisoncohen.com
jgottlieb@morrisoncohen.com
mmix@morrisoncohen.com

*Counsel to Defendant Defendants Lorem
Ipsum UG, Patrick Gruhn, and Robin
Matzke*